

EXHIBIT “12”

Identify all corporations, partnerships, limited liability companies, limited liability partnerships, and any other entity or business that NYBP has provided healthcare billing and/or collection services for and has received payment for such

services. For each entity/business, identify the name of the entity, its address, the dates of your involvement, and your duties and responsibilities.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 3

Identify all shareholders and employees of NYBP, including the date that each person became a shareholder and/or employee.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 4

Identify all job functions, duties, and/or responsibilities carried out by You for or on behalf of NYBP.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 5

Identify all bank accounts (including the account number and financial institution) that were used in relation to the billing, operation, and/or management of the Vine Practice, and which relates to or reflects: (i) any deposits, transfers and/or distributions made for or on behalf of NYBP; (ii) NYBP's income; and/or (iii) money used to pay NYBP's expenses.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 6

Identify all payments of money You or NYBP received from any individual and/or entity in relation to or on account of the Vine Practice. For each payment, identify: (i) who issued the payment; (ii) the method of payment (e.g., cash, check, electronic transfer, or other method); (iii) the financial institution and account number associated with the payment; and (iv) all accounts into which You deposited

or transferred payment that You received, including the financial institution and account number.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 7

Identify each individual and/or entity that You or NYBP communicated with at each Clinic, office, or location related to the Vine Practice. For each person identified, provide the name, address of the Clinic, office, or location where they worked, and describe the manner through which You communicated with each person (i.e., in person, telephone, email, fax, text message, through social media, WhatsApp) by providing the specific phone numbers, fax numbers, email addresses, and social media accounts used to communicate with each identified person. This request should include but not be limited to the following Clinic/office/location addresses: 3910 Church Avenue, Brooklyn, New York; 1120 Morris Park Avenue, Bronx, New York; 1655 Richmond Avenue, Staten Island, New York; 2598 3rd Avenue, Bronx, New York; 3000 Eastchester Road, Bronx, New York; 1611 East New York Avenue, Brooklyn, New York; 4014 Boston Road, Bronx, New York; 7945 Metropolitan Avenue, Queens, New York; 513 Church Avenue, Brooklyn, New York; 1568 Ralph Avenue, Brooklyn, New York; 150 Graham Avenue, Brooklyn, New York; 2088 Flatbush Avenue, Brooklyn, New York; 9016 Sutphin Avenue, Queens, New York; 4250 White Plains Road, Bronx, New York; 4266 3rd Avenue, Bronx, New York; 430 West Merrick Road, Valley Stream, New York; 652 East Fordham Road, Bronx, New York; 611 East 76th Street, Brooklyn, New York; 488 Lafayette Avenue, Brooklyn, New York; 560 Prospect Avenue, Brooklyn, New York; 409 Rockway Avenue, Brooklyn, New York; 1735 Pitkin Avenue, Brooklyn, New York; 3703 92nd Street, Queens, New York; 358 Neptune Avenue, Brooklyn, New York; and 2098 Rockaway Parkway, Brooklyn, New York.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 8

Identify and describe the nature of all agreements relating to or concerning the Vine Practice that relate to any service provided by You and/or NYBP or which resulted in any payment to You or NYBP, regardless of whether You or NYBP were a signatory to the agreements.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 9

Describe your relationship with each of the Defendants, and identify every agreement, contract, retainer, directive, referral arrangement, debt, service invoice, transaction, and/or demand or receipt for payment between You and each Defendant.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 10

Identify each individual and/or entity that is and/or was involved in the creation and/or mailing of bills, cover letters, NF-3 forms, HCFA 1500 forms, assignment of benefit forms, treatment forms, and/or reports for or on behalf of the Vine Practice.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 11

Identify all individuals and/or entities with whom You and/or NYBP communicated with that provided any of the following services for or on behalf of the Vine Practice: (i) operation and/or management services; (ii) marketing and/or advertising services; (iii) legal and/or arbitration services, including collection of No-Fault insurance receivables and the incorporation, formation, or start-up of the Vine Practice; (iv) billing and collection services; (v) accounting, bookkeeping, or tax preparation services; (vi) clerical/administrative services; (vii) consulting of any type; (viii) funding; and/or (ix) health care staffing services. For any entity that is identified, identify the name of all individuals acting on behalf of the entity that performed services for You or the Vine Practice. For each such person that is identified, set forth the type of service that each person provided, and the time period in which the services were provided.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 12

For each individual and/or entity identified in response to Interrogatory Number 11, identify: (i) all agreements or contracts that relate to the Vine Practice, in which You and/or NYBP are in possession; (ii) the individuals with whom You or NYBP communicated with, and describe the manner through which those communications occurred (i.e., in person, telephone, email, fax, text message, direct message through social media account, WhatsApp) by providing the specific phone numbers, fax numbers, email addresses, and social media accounts used to communicate with each identified person.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 13

Identify all individuals and/or entities who made a capital contribution, investment in, contributed any funds, or made any loans to or for the benefit of: (i) the Vine Practice; (ii) You in relation to the Vine Practice; or (iii) NYBP in relation to the Vine Practice. For each individual and/or entity identified, describe the nature of the contribution/investment/loan, the amount of the contribution/investment/loan, and when the contribution/investment/loan was made.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 14

Identify and describe all phone numbers, email addresses, fax numbers, social media accounts, and other methods of communication used by You or NYBP to: (i) communicate with any of the Defendants; or (ii) to communicate with anyone regarding the Vine Practice.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 15

Identify all documents relating to or reflecting communications concerning the Healthcare Services, the operation and/or management of the Vine Practice and/or the services provided by You and/or NYBP in relation to the Vine Practice, by and

between (a) You and any of the other Defendants, and (b) You and any other third-party.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

INTERROGATORY NO. 16

Identify the number of times that you have given sworn testimony, either in the course of an examination under oath, a deposition or at trial. For each instance identified, state the date that the testimony was given, the nature of the proceeding (i.e., examination under oath, deposition or trial) and the insurance company (if applicable) that was involved in the proceeding in which testimony was given.

RESPONSE:

Ms. Marinovich invokes her Fifth Amendment privilege in response to this interrogatory.

Dated: Port Washington, New York
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